

EXHIBIT C

DISPUTED LANGUAGE IN THE PARTIES'
PROPOSED DEPOSITION PROTOCOL ORDER

I. General Provisions: Scheduling and Production of Custodial Files

Defendants' Version	Plaintiffs' Version
[Delete paragraph]	Ten (10) days after any party produces a custodial file, the producing party shall provide a privilege log that corresponds to the custodial file and complies with the requirements of [____]. Any challenges to those privilege logs will be made within seven (7) days. The Parties will meet and confer about any challenges within four (4) days. The Parties will make good faith and reasonable efforts to produce documents initially withheld in whole or in part on grounds of privilege that are downgraded in the privilege logging or meet and confer process within five (5) calendar days of serving the log or the conclusion of the meet and confer unless otherwise agreed upon by the parties. For Defendants' employee or former employee witnesses, personnel files will be produced 14 days before the deposition.

II. General Provisions: Remote Depositions

Defendants' Version	Plaintiffs' Version
6. Counsel and/or the interpreter shall be on camera and shall ensure no audio disruption if there are multiple remote attendees in a single location.	6. Counsel and/or the interpreter shall be on camera, including counsel present in the room with the witness , and shall ensure no audio disruption if there are multiple remote attendees in a single location.

III. Conduct of Depositions: Duration

Defendants' Version	Plaintiffs' Version
<p>Absent agreement of the Parties or a Court order allowing additional time or reducing the allowed time, the time limit for depositions is seven (7) hours of direct examination by the Plaintiffs' attorneys (7 hours for the combined examination of MDL and JCCP Plaintiff attorneys) or by the Defendants' attorneys (7 hours for the combined examination of all Defendants' attorneys), in each case depending on whether a Plaintiff or Defendants noticed the deposition. The seven (7) hours of examination shall not include questioning by the party defending the deposition or other opposing counsel. The noticing party shall be entitled to a minute-for-minute re-cross following any examination conducted by the defending party and/or other opposing counsel. To the extent that the party defending the deposition and/or other opposing counsel conducts a further re-direct examination following the noticing party's re-cross, the noticing party shall be entitled to a minute-for-minute re-recross.</p>	<p>Absent agreement of the Parties or a Court order allowing additional time or reducing the allowed time, the time limit for depositions is seven (7) hours of direct examination by the Plaintiffs' attorneys (7 hours for the combined examination of MDL and JCCP Plaintiff attorneys) or 14 hours for the combined examination by MDL and JCCP Plaintiff attorneys (subject to agreement or Court order from the JCCP) or by the Defendants' attorneys (7 hours for the combined examination of all Defendants' attorneys), in each case depending on whether a Plaintiff or Defendants noticed the deposition. The seven (7) hours of examination shall not include questioning by the party defending the deposition or other opposing counsel. The noticing party shall be entitled to a minute-for-minute re-cross following any examination conducted by the defending party and/or other opposing counsel. To the extent that the party defending the deposition and/or other opposing counsel conducts a further re-direct examination following the noticing party's re-cross, the noticing party shall be entitled to a minute-for-minute re-recross.</p>
<p>Plaintiffs may take up to twenty-five (25) witnesses including 30(b)(6) depositions of the Uber Defendants unless otherwise agreed to by the Parties or ordered by the Court. Limits on the number and duration of plaintiff-specific depositions will be set in a separate court order.</p>	<p>Plaintiffs may take up to twenty-five (25) witnesses including 30(b)(6) depositions of the Uber Defendants unless otherwise agreed to by the Parties or ordered by the Court. Limits on the number and duration of plaintiff-specific depositions will be set in a separate court order.</p> <p>The Court will not set any caps on the number of depositions of Uber witnesses at this time, but will revisit the issue in due time.</p> <p>ALTERNATIVELY: Plaintiffs take may up to one hundred 100 fact depositions, excluding 30(b)(6) witness depositions, of the Uber Defendants, unless otherwise agreed to by the Parties or ordered by the Court.</p>

IV. Conduct of Depositions: Objections and Directions Not to Answer

Defendants' Version	Plaintiffs' Version
[Delete paragraph]	<p><i>3. Authenticity of documents.</i> Any objection to the authenticity of an exhibit produced by a Defendant or Third-Party bearing a bates stamp that is used in the a deposition must be made by the objecting party within thirty (30) days of the deposition, or the exhibit will be deemed authentic. If an objecting party subsequently obtains information that an exhibit is not authentic, such party will promptly notify the party that offered the exhibit, and all Parties shall cooperate as necessary so that the parties do not expend needless resources over authenticity disputes and the Court may promptly resolve the issue.</p>